

S	E	R	V	E	D
September 12, 2016					
FEDERAL MARITIME COMMISSION					

FEDERAL MARITIME COMMISSION

DOCKET NO. 15-10

**REVOCATION OF OCEAN TRANSPORTATION INTERMEDIARY
LICENSE NO. 017843 – WASHINGTON MOVERS, INC.**

ORDER FOR WASHINGTON MOVERS TO SUPPLEMENT THE RECORD

The undersigned has additional questions for Washington Movers based primarily on the exhibits identified in another order served today. *Revocation of Ocean Transportation Intermediary License No. 017843 – Washington Movers, Inc.*, FMC No. 15-10 (FMC Sept. 12, 2016) (Changes to Preliminary Findings of Fact, Identification of Second Set of Exhibits, and Second Set of Preliminary Findings of Fact). On or before September 28, 2016, Washington Movers is instructed to serve and file responses to these questions and the requested documents.

1. Washington Movers identifies a bank account with BB&T Bank active from May 2011 to February 2014 on which Sam Ghanem was an authorized signer. (Respondent's Supplemental Responses to the Bureau of Enforcement's Discovery Requests at 3.)
 - A. Did Washington Movers use the BB&T account to transact its ocean transportation intermediary (OTI) business between January 1, 2014, and February 2014 when the account closed?
 - B. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the BB&T account after January 1, 2014?
 - C. If Sam Ghanem did not sign any checks or transact any business electronically for Washington Movers using the BB&T account after January 1, 2014, identify the person or persons who signed checks or transacted business.
2. Washington Movers identifies a bank account with SunTrust Bank active from February 2014 to October 2014 on which Sam Ghanem was the only authorized signer. (Respondent's Supplemental Responses to the Bureau of Enforcement's Discovery Requests at 3.)

- A. Did Washington Movers use the SunTrust account to transact its OTI business?
 - B. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the SunTrust account?
 - C. If Sam Ghanem did not sign any checks or transact any business electronically for Washington Movers using the SunTrust account, identify the person or persons who signed checks or transacted business.
3. Washington Movers identifies a bank account with PNC Bank active from October 2014 to November 2014 on which Sam Ghanem was an authorized signer. (Respondent's Supplemental Responses to the Bureau of Enforcement's Discovery Requests at 3.)
- A. Did Washington Movers use the PNC account to transact its OTI business?
 - B. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the PNC account?
 - C. If Sam Ghanem did not sign any checks or transact any business electronically for Washington Movers using the PNC account, identify the person or persons who signed checks or transacted business.
4. Washington Movers identifies a bank account with Industrial Bank active from November 12, 2014 to the present on which Sam Ghanem was the only authorized signer until August 15, 2015, Sam Ghanem and Norma Ghanem were authorized signers from August 15, 2015, to March 23, 2016, and Norma Ghanem was the only authorized signer after March 23, 2016. (Respondent's Supplemental Responses to the Bureau of Enforcement's Discovery Requests at 3; WM Ex. T, U; WM Ex. L, M; WM Ex. J, K.)
- A. Did Washington Movers use the Industrial Bank account to transact its OTI business?
 - B. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the Industrial Bank account between November 12, 2014, and August 15, 2015?
 - C. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the Industrial Bank account between August 15, 2015, and March 23, 2016?
 - D. Did Sam Ghanem sign any checks or transact any business electronically for Washington Movers using the Industrial Bank account after March 23, 2016?

5. Sam Ghanem signed Mediterranean Shipping Company (MSC) service contract 14-425WW with Washington Movers, Inc., and Amendment 1 to service contract 14-425WW. (BOE Ex. 26 and 27.)
- A. On what date did Sam Ghanem sign MSC service contract 14-425WW?
 - B. On what date did Sam Ghanem sign the amendment to MSC service contract 14-425WW?
 - C. Did Mediterranean Shipping Company transport cargo for Washington Movers pursuant to MSC service contract 14-425WW?
 - D. Did Washington Movers receive any discounts in freight rates or any other benefits from MSC service contract 14-425WW? If so, identify the benefits.
 - E. Did Washington Movers fulfill its minimum volume commitment under MSC service contract 14-425WW?
 - F. Did Sam Ghanem arrange any shipments using MSC service contract 14-425WW?
 - G. Were Mediterranean Shipping Company and Washington Movers involved in any litigation regarding MSC service contract 14-425WW? If so, identify the litigation by case name, number, and forum.
6. Sam Ghanem signed Mediterranean Shipping Company (MSC) service contract 15-1070TE with Washington Movers, Inc., and Amendment 1 to service contract 15-1070TE. (BOE Ex. 28 and 29.)
- A. On what date did Sam Ghanem sign MSC service contract 15-1070TE?
 - B. On what date did Sam Ghanem sign the amendment to MSC service contract 15-1070TE?
 - C. Did Mediterranean Shipping Company transport cargo for Washington Movers pursuant to MSC service contract 15-1070TE?
 - D. Did Washington Movers receive any discounts in freight rates or any other benefits from MSC service contract 15-1070TE? If so, identify the benefits.
 - E. Did Washington Movers fulfill its minimum volume commitment under MSC service contract 15-1070TE?
 - F. Did Sam Ghanem arrange any shipments using MSC service contract 15-1070TE?

- G. Were Mediterranean Shipping Company and Washington Movers involved in any litigation regarding MSC service contract 15-1070TE? If so, identify the litigation by case name, number, and forum.
7. On April 7, 2014, Sam Ghanem signed Turkon America, Inc. (Turkon) service contract No. 2014-667 with Washington Movers, Inc. (BOE Ex. 30.)
- A. Did Turkon transport cargo for Washington Movers pursuant to Turkon service contract No. 2014-667?
- B. Did Washington Movers fulfill its minimum volume commitment under Turkon service contract No. 2014-667?
- C. Did Washington Movers receive any discounts in freight rates or any other benefits from Turkon service contract No. 2014-667? If so, identify the benefits.
- D. Did Sam Ghanem arrange any shipments using Turkon service contract No. 2014-667?
- E. Were Turkon and Washington Movers involved in any litigation regarding Turkon service contract No. 2014-667? If so, identify the litigation by case name, number, and forum.
8. On April 28, 2014, Sam Ghanem signed United Arab Shipping Co. (United Arab) service contract 2013 0000252641 with Washington Movers, Inc. (BOE Ex. 31.)
- A. Did United Arab Shipping Co. transport cargo for Washington Movers pursuant to United Arab service contract 2013 0000252641?
- B. Did Washington Movers fulfill its minimum volume commitment under United Arab service contract 2013 0000252641?
- C. Did Washington Movers receive any discounts in freight rates or any other benefits from United Arab service contract 2013 0000252641? If so, identify the benefits.
- D. Did Sam Ghanem arrange any shipments using United Arab service contract 2013 0000252641?
- E. Were United Arab and Washington Movers involved in any litigation regarding United Arab service contract 2013 0000252641? If so, identify the litigation by case name, number, and forum.

9. Washington Movers states that Sam Ghanem signed federal and state income tax returns for tax year 2013 on behalf of Washington Movers, Inc. (Respondent's Supplemental Responses to the Bureau of Enforcement's Discovery Requests (filed August 9, 2016) at 1.)
- A. On what date or dates did Sam Ghanem sign the tax returns for tax year 2013?
10. A. Did Washington Movers pay any money to Sam Ghanem for any purpose at any time after January 1, 2014? If so, state the date of the payment, the reason for the payment, and serve and file all records related to the payment.
- B. Did Washington Movers prepare and file with the Internal Revenue Service an IRS Form W-2 or IRS Form 1099 regarding a payment to Sam Ghanem at any time after January 1, 2014? If so, state the date of the payment, the reason for the payment, and serve and file all records related to the payment, including the W-2 or 1099.
11. The Stock Transfer Agreement dated December 31, 2013, states that transferor Sam Ghanem "by separate instrument is transferring to [Norma Ghanem], subject to the consent of the Corporation as herein provided, all right, title and interest of the Transferor in and to the Shares." (WM Ex. A.)
- A. Is the Unanimous Written Consent (WM Ex. B) the "separate instrument" to which the Stock Transfer Agreement refers? If not, serve and file copies of the "separate instrument."
12. The Mediterranean Shipping Company booking confirmation in BOE Ex. 3 identifies the Washington Movers contact person as Mediterranean Shipping Company "Sandra."
- A. Is the "Sandra" identified in the booking confirmation Sandra Rodriguez, identified as a Washington Movers officer in the Washington Movers 2014 Annual Report, BOE Ex. 4?
- B. Serve and file copies of all Washington Movers documents prepared for the shipment identified in BOE Ex. 3, Booking # 038BAL1016511.


Clay G. Guthridge
Administrative Law Judge